

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ALLEN ROBINSON, )  
Plaintiff, ) Case No. 23 C 02724  
v. ) Hon. Judge Martha M. Pacold  
District Judge  
WAYNE FRANO, et al., ) Mag. Judge Heather K. McShain  
Defendants. )  
JURY TRIAL DEMANDED

## **JOINT STATUS REPORT**

Pursuant to this Court's Order (Dkt. 152), the parties submit the following joint status report regarding the completion of fact discovery and a proposed expert schedule:

## **Completion of fact discovery**

1. The parties have completed fact discovery except for the two depositions listed below, and the parties further agree that with the Court's permission they will complete those depositions during the expert discovery period:

- a. As noted in the prior status report, Defendant Celio recently had surgery that requires an extensive recovery period and necessitated his deposition being postponed. Dkt. 150 ¶ 11. Defense counsel expects to have information about when Celio will be physically able to sit for a deposition this week, and the parties will then schedule the deposition.
  - b. Defendant City of Chicago disclosed two additional *Monell* witnesses with approximately two weeks remaining in fact discovery. Plaintiff has requested the deposition of one of those witnesses, which the City is working on scheduling.

**Proposed expert schedule**

2. The parties propose the following schedule for expert discovery:
  - a. Plaintiff's Rule 26(a)(2) disclosures: February 5, 2026
  - b. Defendants' deadline to depose Plaintiff's disclosed experts: March 23, 2026
  - c. Defendants' Rule 26(a)(2) disclosures: May 22, 2026
  - d. Plaintiff's deadline to depose Defendants' disclosed experts: July 6, 2026

**Settlement**

3. There are no current settlement discussions in this case.

Dated: November 3, 2025

RESPECTFULLY SUBMITTED,

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